

COMES NOW Plaintiff, EVA KOPPADY, AS ADMINISTRATOR OF THE ESTATE OF RONALD GIVEN, DECEASED, by and through Counsel, to move that attorney CHANDA GRAHAM, ESQ. (“Ms. Graham”) be disqualified and removed from representation of Plaintiff immediately in this matter, for the following reasons.

1. On or about March 29, 2021, Ms. Graham filed an *Entry of Appearance* in this case without Plaintiff’s prior knowledge or approval.

2. Ms. Graham had been brought into the case by attorney RONALD SKIP KELLEY, ESQ. (“Mr. Kelley”).

3. On or about March 6, 2022, Plaintiff terminated the representation of Mr. Kelley and Ms. Graham. *See* attached Exhibit 1.

4. Ms. Graham has been sent notice to her address that is listed with the Oklahoma Bar Association: P.O. Box 7771, Edmond, OK 73083-7771, as well as her e-mail address at ChandaGPLLC@gmail.com. She has not responded to any of those requests.

5. Under the Oklahoma Rules of Professional Conduct, an attorney “shall withdraw from the representation of a client if ... the lawyer is discharged.” Okla. R. Prof. Conduct 1.16(A)(3). More specifically, Rule 1.16 requires clarity in the termination:

A client has a right to discharge a lawyer at any time, with or without cause, subject to liability for payment for the lawyer's services. Where future dispute about the withdrawal may be anticipated, it may be advisable to prepare a written statement reciting the circumstances.

Id. at comment 4.

6. The March 6, 2022, termination letter provided that specific clarity. *See* attached Exhibit 1.

7. There had been a dispute with Mr. Kelley about his withdrawal that required hearing in the related probate case in the District Court of Pottawatomie County, Oklahoma. *In re*

the Matter of the Estates of Ronald Gene Given and Joshua Given III, Deceased, PB-2020-75.

That Court required Mr. Kelley's withdrawal from the probate matter in the *Order* of July 11, 2022, and reaffirmed that in the *Journal Entry* of March 13, 2023. *See* attached Exhibits 2-3.

8. On or about December 13, 2022, Mr. Kelley filed his *Motion to Withdraw* from this matter, which this Court granted on or about December 15, 2022.

9. To this date, Ms. Graham has not filed her *Application to Withdraw* in this matter.

WHEREFORE, for premises considered, Plaintiff prays this Court will order Ms. Graham to be disqualified in this matter from any further representation of Plaintiff and to provide any and all other just relief available to her.

Dated this 26th day of April, 2023,

Respectfully submitted,

THE LAW OFFICE OF KEVIN R. KEMPER, PLLC
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/s/ Kevin R. Kemper
Kevin R. Kemper, Esq., OBA#32968

CERTIFICATE OF SERVICE

I hereby certify that on or about this 26th day of April, 2023, I electronically transmitted the attached document to the Clerk of the Court using the ECF System for filing. Based on the records currently on file, the Clerk of the Court will transmit a Notice of Electronic Filing to those registered participants of the ECF System. I further certify that on or about this 26th day of April, 2023, I mailed in the U.S. Mail, certified with return receipt requested, postage pre-paid, the attached document to the following who is not a registered participant of the ECF System.

EVA GIVEN KOPADDY
2725 S.W. 49th St.
Oklahoma City, OK 73119
Plaintiff

/s/ Kevin R. Kemper
KEVIN R. KEMPER